

Appendix D

Initial Study

APPENDIX D ENVIRONMENTAL REVIEW

PROJECT INFORMATION

1. Project Title: Napa-Sonoma Marshes Wildlife Area, Land Management Plan
2. Lead Agency Name and Address: California Department of Fish and Game
Region 3 Bay Delta
7329 Silverado Trail
Napa, CA 94558
3. Contact Person and Phone Number: Karen Taylor, Area Manager 707/944-5567
4. Project Location: Sonoma, Napa, and Solano Counties, California
5. Project Sponsor's Name and Address: Same as above
6. General Plan Designation/Zoning: Land Extensive Agriculture; Agriculture; Watershed; Open Space; Airport Compatibility Overlay District
7. Description of Project:

The project is the Land Management Plan (LMP) for the Napa-Sonoma Marshes Wildlife Area (Wildlife Area). The purposes of the Napa-Sonoma Marshes Wildlife Area Land Management Plan are:

- To guide the adaptive management of habitats, species, and programs described herein by achieving the Department's mission of protecting and enhancing fish, wildlife, and native plant values.
- To serve as a guide for appropriate public uses of the property.
- To serve as a descriptive inventory of fish, wildlife and native plant habitats which occur on or use this property, and to outline appropriate public uses of these resources.
- To provide an overview of the area's operation and maintenance, and personnel requirements to implement management goals and objectives. This plan serves as a budget planning aid for annual budget preparation
- Complete environmental impacts and subsequent mitigation which may occur during management. This plan contains environmental documentation to comply with state and federal statutes and regulations.

This LMP consists of six chapters as follows:

- I. Introduction
- II. Property Description and Management Setting
- III. Environmental Setting
- IV. Resource Management and Public Use Issues
- V. Management Goals
- VI. Operations and Maintenance

This LMP provides a description of the Wildlife Area and its environment. It also includes an evaluation of public uses that are compatible with the purpose of the Wildlife Area.

This Initial Study is intended to consider the whole of the project. As such, this project and this Negative Declaration include the following components:

- The ongoing operation of the Wildlife Area including the public uses incorporated in this LMP.
- Maintenance activities (e.g., habitat management and agricultural) to sustain the biological communities

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that provide habitat for wildlife and fisheries resources.

- Installation of minor improvements, such as signs and trails that do not involve substantial physical disruption of the Wildlife Area.
- Restoration and enhancement of seasonal and perennial wetlands, grasslands, managed ponds, and riparian communities.
- Maintenance of improvements to the Wildlife Area.
- Monitoring activities and scientific research.
- Ongoing coordination with public agencies and private entities consistent with the goals of this LMP.
- The provision of public information regarding the Wildlife Area that may include hardcopy and online data as well as other media.
- Update of Wildlife Area regulations.
- Enforcement of duly adopted laws and regulations.

This LMP is a general policy guide to the management of the Wildlife Area. It does not specifically authorize or make a precommitment to any substantive physical changes to the Wildlife Area. With the exception of ongoing restoration and enhancement, and operations and maintenance activities, any substantive physical changes that are not currently approved will require subsequent authorizations and approvals.

Because potential physical changes to the Wildlife Area would be a part of subsequent projects that have not yet been conceived, designed, or funded, it is not possible to reasonably evaluate the impacts of any such projects. Any such subsequent projects will be subject to CEQA review and will be considered in light of the contents of the LMP and this Initial Study. If a subsequent project is not included within the scope of this LMP (i.e., specific goals and tasks), it will require appropriate analysis and documentation pursuant to CEQA when it is conceived and proposed for approval. The type of additional CEQA review completed would be determined based on CEQA Guidelines Sections 15162-15164.

Two specific restoration projects currently under implementation occur within the Wildlife Area, the Napa Plant Site Restoration Project and the Napa River Salt Marsh Restoration Project. The LMP would result in the continued implementation of these two projects as they have been previously proposed. These projects also represent all activities currently planned by DFG to occur within the boundaries of these project sites. For the Napa Plant Site Restoration Project, DFG complied with CEQA through the preparation an Environmental Impact Report and associated documents and filed a Notice of Determination on March 28, 2007. For the Napa River Salt Marsh Restoration Project, the California State Coastal Conservancy complied with CEQA through the preparation an Environmental Impact Report and associated documents and filed a Notice of Determination on June 13, 2006. Implementation of the LMP would not result in any changes in the severity of any environmental impacts or mitigation measures described in the Environmental Impact Reports prepared for the Napa Plant Site Restoration Project and Napa River Salt March Restoration Project. Therefore, the analysis contained in this Initial Study does not include any impacts that would occur at the Napa Plant Restoration Site Project site or Napa River Salt March Restoration Project site, because those environmental impacts, mitigation measures, and findings under CEQA have been previously addressed.

8. Surrounding Land Uses and Setting:
(Briefly describe the project's
surroundings)

See Chapter 2 – Property Description and Chapter 3 –
Environmental Setting

9: Other public agencies whose approval is required:

No other public agency approval is required for the

(e.g., permits, financing approval, or participation agreement)	adoption of the Napa-Sonoma Marshes Wildlife Area LMP.
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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agricultural Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology /Soils |
| <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Hydrology / Water Quality | <input type="checkbox"/> Land Use / Planning |
| <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise | <input type="checkbox"/> Population / Housing |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation/Traffic |
| <input type="checkbox"/> Public Services | | |
| <input type="checkbox"/> Utilities / Service Systems | <input type="checkbox"/> Mandatory Findings of Significance | <input checked="" type="checkbox"/> None |

Determination

On the basis of this initial evaluation:

- ☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier Environmental Impact Report (EIR) or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

Printed Name

Title

Agency

EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less-Than-Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less-than-significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances).

Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. **Supporting Information Sources:** A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify: the significance criteria or threshold, if any, used to evaluate each question; and the mitigation measure identified, if any, to reduce the impact to less than significance.

I. AESTHETICS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?				X
b. Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c. Substantially degrade the existing visual character or quality of the site and its surroundings?			X	
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				X

DISCUSSION

a), b), d) No Impact. Adoption and implementation of the proposed LMP would preserve existing native vegetation, cultural, and natural visual resources, and would not involve the construction of any new buildings or outdoor lighting. Therefore, adoption of the LMP would not adversely affect scenic vistas, views, visual character, or scenic resources, nor would it create light or glare effects.

c) Less-Than-Significant Impact. Implementation of some of the management tasks described in the proposed LMP would involve modifications to the existing landscape (e.g., restoration or enhancement activities, placement of signage, maintenance and improvement of existing structures and facilities, such as water control structures, roads and restrooms, construction of new trail alignments). The primary visual character of the Wildlife Area consists of undeveloped open space, creeks, sloughs, and marshes, which are congruent with natural resource habitats of the area. Activities that would be implemented as a result of adoption of the proposed LMP would improve the visual character and quality in the Napa-Sonoma Marshes Wildlife Area, because they involve protection, management, and enhancement of natural resource habitats.

II. AGRICULTURAL RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and project site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?			X	
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?			X	
c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?			X	

DISCUSSION

a) Less-Than-Significant Impact. Napa-Sonoma Marshes Wildlife Area does not contain lands designated as Prime Farmland or Unique Farmland. A small parcel of land (4.58 acres) located along the western boundary of Southern Crossing Unit is designated as Farmland of Statewide Importance. Currently the unit functions as grazed pasture and seasonal and permanent wetland. Proposed goals included in the LMP support habitat restoration and enhancement as well as grazing use in the NSMWA as a management tool to enhance wildlife habitat. Adoption of the proposed LMP could result in the continuation of grazing uses in the area. However, grazing practices (e.g. number of animals, timing) might change to accomplish the desired habitat restoration and enhancement goals.

Restoration of habitat would re-establish long-term ecological processes and functions present in natural communities, including the natural formation of soils that gave these sites their original agricultural value. Fully functioning ecosystems are also known to improve groundwater and surface water quality by removing undesirable constituents, such as pesticides (Brown and Wood 2002). Habitat restoration and enhancement activities in portions of the Wildlife Area that are designated as Farmland of Statewide Importance and currently in agriculture uses (grazing) could benefit onsite and adjacent agricultural lands by diminishing the volume and frequency of pesticides applied to the properties, slowing the loss of soils from the sites onto adjacent or downstream locations, and by increasing groundwater levels. Because the agricultural value of the soil is tied directly to the natural conditions and processes that existed before commercial agricultural development of the land, habitat restoration efforts would, in effect, be preserving (and possibly improving over time) the agricultural value of the soil (Cannon 2004, Tilman et al. 1996 and 2002).

While the current mission of DFG is to manage California's diverse fish, wildlife, and plant resources, and the habitats upon which they depend, for their ecological values and for their use and enjoyment by the public, there are no tasks included in the LMP that include the establishment of any facilities, structures, or land uses that would physically or economically preclude returning the land to cultivation in the future, if there were to be such a public policy decision. Implementation of the proposed LMP, which would maintain the land as natural habitats and encourage grazing use as a management tool in the unit, would not be prohibitively costly to return to its present condition. Returning the land to grazing pasture would require no physical change to the environment, and returning the land to cultivation would require removing the native vegetation and implementing some soil preparation, which is similar to the requirements of the original clearing of habitat necessary to create farmed land decades ago.

In contrast, when farmland is converted to urban uses, the resulting construction of urban infrastructure and buildings, and the compaction and paving of soils with cement or petrochemical products makes the conversion irreversible. When farmland is lost because of the encroachment of urban uses, the cost of returning these urban uses to farmed land would be prohibitive, given the necessity to demolish buildings and remove infrastructure, not to mention the consequent loss of resource values that made these soils productive in the first place when urban uses were constructed.

For the reasons provided above, implementation of the proposed LMP would not result in a permanent loss of acreage in Farmlands of Statewide Importance and it would not cause damage to the physical properties of agricultural soils. Continued restoration of portions of the Wildlife Area to habitat would be expected to improve the physical characteristics of these lands within the Wildlife Area and downstream that originally contributed to their value as farmlands. Therefore, this impact is considered less than significant.

b) Less-Than-Significant Impact. Portions of the Napa-Sonoma Marshes Wildlife Area are designated as Agriculture, Watershed and Open Space in Napa County (Napa County 2002), and Land Extensive Agriculture (LEA B6 100z) in Sonoma County (Sonoma County 2007) and Solano County (Solano County 1999). Lands designated as Land Extensive Agriculture are agricultural lands that tend to have low production per acre and are not irrigated. Permitted uses on these lands include: public parks and "management of land for watershed, for fish and wildlife habitat, fish rearing ponds, hunting and fishing, where these uses are incidental to the primary use". In all three counties, land use designations of these areas allow for use as public parks and open space (Sonoma County 2007; Napa County 2002; Solano County 1999), and hence this impact is considered less than significant. There are no Williamson Act contracts in the Wildlife Area.

c) Less-Than-Significant Impact. Implementation of the proposed LMP would not hinder or stop farming operations on adjacent properties. Implementation of the proposed LMP would not involve land development activities (i.e., residential subdivisions, or commercial or industrial land uses) that would directly or indirectly induce changes in the use of surrounding agricultural land, such as the need for schools, public services, etc. Implementation of the LMP would not induce new residential, commercial, or industrial land development activities to occur in the future. Activities would be confined to the Wildlife Area and no substantial new infrastructure would be required off-site. The project would restore the plant and animal communities in keeping with the existing managed facilities in the Wildlife Area. New types of land uses would not be introduced into any areas that are currently rural and would be composed primarily of open space uses.

For the reasons provided above, implementation of the proposed LMP would not involve other changes in the existing environment, which, due to their location or nature, could result in conversion of farmland to nonagricultural use. Therefore, this impact is considered less than significant.

III. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?			X	
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?			X	
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			X	
d. Expose sensitive receptors to substantial pollutant concentrations?			X	
e. Create objectionable odors affecting a substantial number of people?			X	

DISCUSSION

a), b), c), d), e) Less-Than-Significant Impact. Although implementation of some of the management tasks described in the proposed LMP could involve the use of construction equipment (e.g., continued operations and maintenance, restoration or enhancement activities) thus increasing equipment emissions in the immediate vicinity, these would be short term impacts and would not cause a considerable cumulative net increase of air pollutants. Potential restoration projects could include the excavation of wetlands, which could release objectionable odors, but it is not anticipated that these types of odors would be released in large quantities and would not result in a violation of any air quality standards. Prescribed burn is identified in the LMP as one of the potential components in integrated pest management and could temporarily impair air quality in the surrounding area. No specific prescribed burn project is proposed in the LMP. As described in the LMP, DFG would implement a plan to integrate pest management, which in part would result in protocol for implementing prescribed burns. This plan would be developed in conjunction with the Bay Area Air Quality Management District. Development of a protocol for conducting prescribed burns would minimize impacts to the general air quality, would not result in violations of air quality standards, and would not expose sensitive receptors to substantial pollutant concentrations. Additionally, such a plan that would be consistent with the LMP, would be subject to CEQA review in light of the information in this document. The type of additional CEQA review completed would be determined based on CEQA Guidelines Sections 15162-15164. Therefore, this would be a less-than-significant impact.

IV. BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X	
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X	
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?			X	
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			X	
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

DISCUSSION

a), b), c), d) Less-Than-Significant Impact. Although implementation of some of the management tasks described in the proposed LMP would have the potential for temporary construction impacts to plants, wildlife, fish, and sensitive habitats such as wetlands (e.g., restoration or enhancement activities), it is anticipated that these impacts would not be substantial and that these projects would have a net benefit to wildlife and habitat. Any of these types of activities would be implemented in conformance with regulatory requirements such as DFG regulations, USFWS regulations, State Board regulations, BCDC regulations, Section 404 of the CWA, and any applicable plans or ordinances protecting biological resources.

The LMP includes habitat preservation and enhancement as primary goals for the protection of plant, wildlife, and fish species, and their habitat. It also ensures that all actions comply with federal and state Endangered Species Acts and other applicable regulations aimed at the

protection of special-status species and wildlife.

e), f) No Impact. The San Francisco Bay Plan (Bay Plan) identifies the NSMWA as wildlife refuge, tidal marsh, and managed wetlands (SFBCDC 2007). The purpose of the Bay Plan is to protect the Bay, its sloughs, estuaries, salt ponds, tidal marshes, managed wetlands, and other natural resources, and to develop the Bay and the shoreline to the highest potential with the minimum fill. The Bay Plan promotes the maintenance of wildlife areas and its policies focus on preservation of the natural resources of the Bay. The proposed LMP is consistent with the Bay Plan.

No existing adopted Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP) is currently in place for Napa County. The Santa Rosa Plain Conservation Strategy, often referred to as the Sonoma Plan, is the only regional HCP for Sonoma County, but the NSMWA is not within the plan area in the Sonoma Plan (USFWS 2005). Solano County is currently in the process of preparing an HCP. In the 2007 Draft Solano HCP, the Wildlife Area falls in Zone 3 of the plan area and is classified as Coastal Marsh Natural Community (LSA 2007). Covered activities within this zone relate primarily to "the implementation of the HCP reserve system, including adaptive management and monitoring, habitat enhancement, habitat restoration and construction, scientific collection, and other associated compatible activities on designated reserves/preserves, mitigation sites/banks, and other associated adjacent lands." The proposed LMP is consistent with the provisions of the draft Solano HCP. Hence, adoption of the proposed LMP would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state habitat conservation plan.

V. CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?			X	
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?			X	
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	
d. Disturb any human remains, including those interred outside of formal cemeteries?			X	

DISCUSSION

a), b), c), d) Less-Than-Significant Impact. Although implementation of some of the management tasks described in the proposed LMP would involve ground disturbance (e.g., ongoing operations and maintenance, and restoration or enhancement activities), the LMP includes requirements for cultural resource surveys prior to major ground disturbance (e.g., excavations below normal plow depths) at undisturbed sites, and consultation with the Native American Heritage Commission (NAHC) as appropriate. The LMP also requires that historic structures be formally recorded and evaluated. Site records and culturally significant resources that may be eligible for inclusion in the NRHP or the CRHR would be submitted to the SHPO. In the event that human remains are discovered, the specific protocol, guidelines, and channels of communication outlined by the NAHC, and in accordance with Section 7050.5 of the Health and Safety Code, Section 5097.98 of the Public Resource Code (Chapter 1492, Statutes of 1982, Senate Bill 297), and SB 447 (Chapter 44, Statutes of 1987) will be followed. Pursuant to PRC, Section 7050.5, in the event of the discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which human remains are discovered has determined the remains are archaeological. If the coroner determines that the remains are not subject to his or her authority, and if he or she recognizes the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC. In addition, prior to implementation of any projects that are consistent with the LMP, DFG would subject them to CEQA review in light of the information in this document. The type of additional CEQA review completed would be determined based on CEQA Guidelines Sections 15162-15164 and follow the recommendations described in Cultural Resources Technical Report for the Napa Sonoma Marsh Wildlife Area Land Management Plan.

VI. GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:			X	
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Pub. 42.			X	
ii. Strong seismic ground shaking?			X	
iii. Seismic-related ground failure, including liquefaction?			X	
iv. Landslides?			X	
b. Result in substantial soil erosion or the loss of topsoil?			X	
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?			X	
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?			X	
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X

DISCUSSION

a), b), c), d), Less-Than-Significant Impact. The project area is likely to undergo strong ground shaking from a major earthquake in the Bay Area within the next 30 years (U.S. Geological Survey 1999). Seismic events are also likely to occur during the timeframe of the proposed LMP. Implementation of the LMP would repair old levees and water control structures, and therefore increase the levees' ability to withstand the effects of a major earthquake in the Bay Area. Any new structures would be designed and constructed according to the applicable building code for seismic integrity within this region. The Wildlife Area is on unconsolidated sediments, which are known to amplify and prolong seismic ground shaking, but with ongoing maintenance and upgrades to levees and water control structures and the construction of new structures following the appropriate building code, this impact would be less than significant.

Implementation of some of the management tasks described in the proposed LMP would involve ground disturbance (e.g., maintenance activities, restoration or enhancement activities), but these activities would be implemented using Best Management Practices to minimize soil erosion and/or topsoil loss, and would be conducted in conformance with regulatory requirements under the National Pollutant Discharge Elimination System (33 United States Code 1342) and Section 401 of the Clean Water Act.

e) No Impact. No construction of septic tanks or alternative waste water disposal systems are proposed as part of the LMP nor would any be required as a result of the implementation of any of the LMP goals or tasks; therefore, implementation of the LMP would result in no impact.

VII. HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.				X
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?			X	
f. For a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				X
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
h. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?			X	

DISCUSSION

a), b) Less-Than-Significant Impact. Land uses surrounding the NSMWA and previous land uses that occurred within the NSMWA may present potential sources of hazardous materials to the NSMWA. Pesticides from agricultural runoff and those associated with former mosquito abatement activities may affect the area. Cattle grazing, animal husbandry activities, and

agricultural runoff may contribute coliform bacteria, ammonia, nitrate, and phosphorus. Miscellaneous industrial and airport activities on the surrounding lands likely involve the use of hazardous substances and have the potential for environmental contamination due to chemical spills, discharges, and/or leaking storage tanks.

The potential for an accidental release of hazardous materials into the environment would be minimized through the implementation of the LMP. The tasks described to prevent the accidental release of unknown hazardous materials potentially contained within soils would result in the protection of the general public and any workers in an area of excavation activities. Additionally, the use of pesticides would follow a protocol developed by DFG, which would result in the protection of the general public from a hazardous materials release.

Implementation of some of the tasks described in the proposed LMP could involve transporting and using hazardous materials such as fuels. Hazardous materials transport is regulated by numerous federal, state, and local laws and regulations that stipulate minimum standards for transportation requirements, spill prevention procedures, emergency response and contingency plans, risk management, and employee training procedures. All work to occur in the NSMWA would occur under compliance with applicable laws and regulations pertaining to worker safety and health. In the event that a fuel or oil spill was to occur during the transport of this material or during a construction period, these materials would not pose a significant hazard to the public due to these safety guards.

c), d), f), g) No Impact. Implementation of the LMP would not emit hazardous emissions or require handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The proposed project is not located on a site that is included on a list of hazardous materials sites compiled pursuant to California Government Code Section 65962.5. The Wildlife Area is not in the vicinity of a private airstrip. Implementation of the LMP would not interfere with an adopted emergency response plan or emergency evacuation plan.

e) Less-Than-Significant Impact. The Southern Crossing Unit and the eastern portion of the Huichica Creek Unit are located within two miles of the Napa County Airport and overlap with Napa County Airport Land Use Compatibility Plan zones. Adoption of the LMP would not lead to large scale changes in bird habitat. Currently, perennial and seasonal wetlands as well as adjacent uplands are distributed throughout the Wildlife Area and have provided valuable habitats for numerous bird species. With the implementation of the proposed LMP, specific projects would be developed and implemented that would be consistent and compatible with the applicable Napa County Airport Land Use Compatibility Plan zones and FAA advisory guidelines related to bird-strike hazards. By developing and implementing projects under the LMP that would be consistent with these airport planning tools, implementation of the proposed LMP would not result in a safety hazard for people residing or working in the project area. Thus, this would be a less than significant impact.

h) Less-Than-Significant Impact. Prescribed burn is suggested in the LMP as one of the components for invasive species control through integrated pest management and may expose people or structure to wildland fires. No specific prescribed burn project has been identified in the proposed LMP. As described in the LMP, DFG would implement a plan to integrate pest management, which in part would result in protocol for implementing prescribed burns. This plan would be developed in conjunction with the applicable fire agency. Development of a protocol for conducting prescribed burns would result in burns that would minimize risk and hazards, especially in areas that would expose people or structures to a significant risk of loss, injury, or death. Additionally, such a plan that would be consistent with the LMP, would be subject to

CEQA review in light of the information in this document. The type of additional CEQA review completed would be determined based on CEQA Guidelines Sections 15162-15164. Therefore, this would be a less than significant impact.

VIII. HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements?			X	
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				X
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off-site?			X	
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site?			X	
e. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?			X	
f. Otherwise substantially degrade water quality?				X
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				X
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				X
i. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?			X	
j. Inundation by seiche, tsunami, or mudflow?				X

DISCUSSION

a), c), d), e), i) **Less-Than-Significant Impact.** Implementation of some of the management

tasks described in the proposed LMP (e.g. restoration or enhancement activities) would involve a potential for the discharge of sediments or pollutants and alteration of drainage patterns. These project activities would be implemented using Best Management Practices to minimize soil erosion and/or topsoil loss, and would be conducted in conformance with regulatory requirements under the National Pollutant Discharge Elimination System (33 United States Code 1342) and Section 401 of the Clean Water Act. Additionally, these projects would be implemented with a goal of a net improvement in water quality. Also, management tasks call for the repair of old levees and water control structures, and therefore restoration and maintenance of flood protection.

Additionally, during the design phase of any potential projects, DFG would be required to coordinate with local flood control agencies regarding the design and operation of restoration and enhancement projects that have the potential to conflict with necessary flood flow conveyance requirements.

b), g), h), j) No impact. Adoption of the proposed LMP would not substantially deplete groundwater supplies or interfere with groundwater recharge such that a net deficit in aquifer volume or a lowering of the local groundwater table would occur. Adoption of the proposed LMP would not place housing within a 100-year Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, place structures which would impede or redirect flood flows within a 100-year flood hazard area, or alter existing risks of seiche, tsunami, or mudflow.

f) No Impact. The proposed LMP supports habitat restoration and enhancement of natural communities (e.g., seasonal and permanent wetlands, riparian woodlands, and grasslands). Restoration of natural communities and associated physical, chemical, and biological processes generally has beneficial effects on water quality. One water quality variable of concern associated with restoration of wetlands, however, is mercury (Hg).

Mercury contamination is widespread in sediments and waters of the San Francisco Bay area (San Francisco Estuary Institute 2000, San Francisco Bay RWQCB 2000). Mercury is a constituent of particular concern to wetland restoration projects because of its ability to convert to the methylated form of the metal, which is relatively more mobile in aquatic environments than other forms. As explained in more detail below, the sulfate reducing bacteria typically associated with marsh sediments methylate mercury as part of their respiration process, making it more bioavailable to aquatic life.

Long-term RMP monitoring data for total mercury in water and sediment has consistently shown elevated concentrations, primarily in the North and South Bay areas and river tributaries. There is also a strong correlation between total mercury and suspended sediment transport in the water (San Francisco Estuary Institute 2002). Elevated mercury levels are in large part a legacy of the California gold mining era, when mercury was used in the gold refining process. Mines such as South San Francisco Bay's New Almaden Mine are known to be a source of mercury in the South Bay. Mercury can be delivered to the San Pablo Bay system via the Delta.

In aquatic environments, most mercury is chemically bound to suspended particles of soil or sediment; a smaller fraction is bound to dissolved organic carbon. Sediment-bound mercury may be available to aquatic organisms and is thus a pollutant of concern; the potential for adverse environmental effects from sediment-bound mercury depends primarily on transport and depositional characteristics (e.g., particle size) and on the physical and chemical properties of the sediment.

Additionally, sediment-bound mercury may be converted through both biotic and abiotic processes to its more bioavailable methylated form. Factors conducive to methylation of mercury include low-flow or stagnant waters, hypoxic or anoxic conditions in the water or sediment column, low pH ($\text{pH} < 6$), and high concentrations of dissolved carbon. Most of these factors are in turn affected by biological processes such as metabolism, growth, and decay. Therefore, upland sediments containing sediment bound mercury can become a source of methyl mercury when exposed to tidal action.

The LMP describes a goal of minimizing ecological risks and minimizing the mobilization of contaminants present in sediments. Implementation of management tasks associated with the LMP would not increase the environment in which mercury can become methylated. Therefore, the impacts to water quality from the implementation of the proposed LMP would result be less than significant.

IX. LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Physically divide an established community?				X
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.			X	
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?				X

DISCUSSION

a), c) No Impact. The proposed LMP would not require any physical changes to an established community, nor would implementation of any activity following adoption of the LMP physically divide an established community. The goals of the LMP provide for natural resource protection and preservation and require that any projects implemented following adoption of the proposed LMP conform to any habitat conservation plans and natural community conservation plans that may be applicable at that time.

b) Less-Than-Significant Impact. Sonoma, Napa, and Solano counties have designated the project area as Land, Extensive Agriculture, Agriculture, Watershed, Open Space and Airport Compatibility Overlay District. Implementation of the proposed LMP would be consistent with these land use designations. The Southern Crossing Unit and the eastern portion of the Huichica Creek Unit are located within two miles of the Napa County Airport and overlap with Napa County Airport Land Use Compatibility Plan zones. With the implementation of the proposed LMP, specific projects would be developed and implemented that would be consistent and compatible with the applicable Napa County Airport Land Use Compatibility Plan zones. By developing and implementing projects under the LMP that would be consistent with this airport-specific plan overlay, implementation of the proposed LMP would not conflict with any applicable land use plan. Thus, this would be a less-than-significant impact.

X. MINERAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				X

DISCUSSION

a), b) No Impact. Implementation of the LMP would not result in resource extraction. According to the U.S. Geological Survey Mineral Resources Data System (2005), there are no known mineral resources located within the Wildlife Area except for salt at the Napa Plant Site. A separate Environmental Impact Report has been prepared for the Napa Plant Site Restoration Project, and the analysis contained in this Initial Study does not include any impacts that would occur at the Napa Plant Site, therefore the proposed LMP would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state or conflict with mineral resource protection plans or result in the loss of a known mineral resource. There would be no impact.

XI. NOISE

Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			X	
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			X	
f. For a project located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				X

DISCUSSION

a), b), c), d), e) Less-Than-Significant Impact. Although implementation of some of the management tasks described in the proposed LMP could involve the use of construction equipment (e.g., maintenance, and restoration or enhancement activities) thus temporarily increasing ambient noise, these activities would be short-term and temporary and would not be anticipated to result in a substantial increase in ambient noise levels generated by existing hunting activities within the Wildlife Area and airport activities northeast of the Wildlife Area.

f) No Impact. The Napa-Sonoma Marshes Wildlife Area is not located within the vicinity of a private airstrip. Additionally, the proposed LMP would not result in the development of any noise-sensitive receptors, nor would the LMP result in the exposure of people residing or working in the Wildlife Area to excessive noise levels. No impact is anticipated to occur.

XII. POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b. Displace substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere?				X
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				X

DISCUSSION

a), b), c). No Impact. The proposed LMP would not involve any change in housing nor would it induce growth by the provision of new infrastructure or by the removal of any barriers to growth. Implementation of some of the management goals and tasks may require additional staff hours, but this would not be anticipated to induce a population growth that would require additional housing.

XIII. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Fire Protection?			X	
b. Police Protection?			X	
c. Schools?			X	
d. Parks?			X	
e. Other public facilities?			X	

DISCUSSION

a), b), c), d), e) Less-Than-Significant Impact. Adoption of the proposed LMP would not require substantial changes to existing levels of public services. Implementation of public use and facilities goals could require a minimal increase in staff hours per year by the fire department, the County Sheriff's department, and DFG staff, but these potential minimal increases would not be anticipated to create the need for new or altered facilities.

XIV. RECREATION

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than- Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?			X	
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			X	

DISCUSSION

a), b) Less-Than-Significant Impact. Adoption and implementation of the proposed LMP would not significantly increase the levels of wildlife-dependent recreational use of the Wildlife Area. The number of these recreational users would not exceed the carrying capacity of the natural resources or degrade existing natural features or recreational facilities.

XV. TRANSPORTATION/TRAFFIC

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?			X	
b. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?			X	
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?			X	
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
e. Result in inadequate emergency access?			X	
f. Result in inadequate parking capacity?			X	
g. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?				X

DISCUSSION

a), b), c), d), e), f) Less-Than-Significant Impact. Implementation of the proposed LMP could provide additional access points for angling and improve access for other recreational uses (e.g. improve footpaths and trails). The level of use at the Wildlife Area may increase, but no significant change is anticipated. Therefore, no significant changes are anticipated to automobile, boat, or air traffic levels, emergency access, and parking capacity. The proposed LMP supports public access designs that minimize maintenance and policing.

g) No Impact. Adoption of the LMP would not conflict with adopted policies, plans, or programs supporting alternative transportation.

XVI. UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			X	
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			X	
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			X	
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?			X	
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			X	
g. Comply with federal, state, and local statutes and regulations related to solid waste?			X	

DISCUSSION

a), b), c), d), e), f), g) Less-Than-Significant Impact. The LMP does not include a proposal for additional storm drain facilities, additional water supplies, additional wastewater treatment, or additional solid waste disposal. Existing wastewater treatment systems are currently adequate for public use and department facilities. Adoption of the proposed LMP and implementation of the goals and tasks contained therein would not require the construction of new residences or service-related facilities; therefore, adoption of the proposed LMP would generate no changes to storm drain facilities, additional water supplies, or additional wastewater treatment. Implementation of the LMP would require additional trash receptacles at strategic locations, but mainly to address the current littering issues in the Wildlife Area. Therefore, these impacts would be less than significant.

XVII. GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment ?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

DISCUSSION

a), b) Less-Than-Significant Impact.

The NSMWA is located in the Bay Area Air Quality Management District. The NSMWA LMP proposed goals and tasks will not conflict or obstruct implementation of the Districts air quality plans nor contribute significantly to any air quality violations. LMP implementation will not construct any stationary sources of criteria pollutants, nor add to mobile sources, therefore, will not contribute to increasing local levels of green house gas (GHG) emissions. Implementation of the goals and tasks of the LMP will most likely reduce GHG through habitat preservation, wetland restoration and subsequent carbon sequestration. The Intergovernmental Panel on Climate Change recommends wetland restoration as a carbon sequestration strategy. Although some proposed LMP management tasks could involve the use of construction equipment (e.g., continued operations and maintenance, restoration or enhancement activities) thus temporarily increasing equipment emissions, these would be short-term impacts and would not cause a considerable cumulative net increase of air pollutants. Prescribed burn is identified in the LMP as one of the potential components in integrated pest management and could temporarily impair air quality in the surrounding area. No specific prescribed burn project is proposed in the LMP. As described in the LMP, DFG would implement a plan to integrate pest management, which in part would result in protocol for implementing prescribed burns. This plan would be developed in conjunction with the Bay Area Air Quality Management District. Additionally, such a plan that would be consistent with the LMP, would be subject to CEQA review in light of the information in this document.

There are no predicted significant increases in NSMWA use levels (including automotive, boat or air traffic levels) following LMP adoption. No design changes are proposed for current road access, nor are any changes anticipated with traffic patterns. Hence, it is not expected to have a substantial increase in overall vehicle miles traveled by administrative personnel or the public. The NSMWA LMP management tasks do not utilize additional surface or groundwater resources and integrates many of the actions outlined in an internal policy referenced as “DFG Going Green – Reducing Our Carbon Footprint”. Overall, the NSMWA LMP does not conflict with the Department’s overall undertaking of reducing GHG emissions as part of its compliance within the

Natural Resources Agency's adherence to Assembly Bill 32 and Senate Bill 97.

In addition, prior to implementation of projects consistent with the LMP, CDFG would subject them to CEQA review according to the recent CEQA Guidelines Section 15064.4, to determine if additional CEQA documentation is necessary. CEQA Guidelines Sections 15162-15164 and 15168 would guide the type of additional CEQA review to be completed.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or wildlife community, reduce the number or restrict the range of an endangered, rare or threatened plant or wildlife, or eliminate important examples of the major periods of California history or prehistory?			X	
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?			X	
c. Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?			X	

Authority: Public Resources Code Sections 21083 and 21087.

Reference: Public Resources Code Sections 21080(c), 21080.1, 21080.3, 21082.1, 21083, 21083.3, 21093, 21094, 21151; *Sundstrom v. County of Mendocino*, 202 Cal.App.3d 296 (1988); *Leonoff v. Monterey Board of Supervisors*, 222 Cal.App.3d 1337 (1990).

DISCUSSION

a). Less-than-Significant Impact. Adoption of the proposed LMP and implementation of the goals and tasks contained therein would help preserve and enhance natural resources. Some activities that could be implemented as a result of adoption of the proposed LMP would have a potential for impacts to biological and cultural resources (e.g., restoration or enhancement activities), as described in Sections IV and V above. However, because activities would be conducted following all applicable regulatory requirements, because many of the goals and tasks are designed to have a net benefit to these resources, and because no large scale projects are anticipated which could threaten entire populations or communities, adoption of the proposed LMP would not be anticipated to cause a significant impact to these biological or cultural resources. In addition, prior to implementation of any projects that are consistent with the LMP, DFG would subject them to CEQA review in light of the information in this document. The type of additional CEQA review completed would be determined based on CEQA Guidelines Sections 15162-15164.

b) Less-Than-Significant Impact. Adoption of the proposed LMP and implementation of the goals and tasks contained therein would not require any substantial infrastructure improvements or new construction, and any implementation activities would be conducted following all

applicable regulatory requirements. In addition, most of the proposed goals and tasks are encourage a net benefit to environmental conditions. Therefore, although there is a potential for some temporary and less than significant impacts to the environment as described above, none of these impacts are anticipated to be cumulatively considerable. In addition, prior to implementation of any projects that are consistent with the LMP, DFG would subject them to CEQA review in light of the information in this document. The type of additional CEQA review completed would be determined based on CEQA Guidelines Sections 15162-15164.

c) Less-than-Significant Impact. The proposed project is an LMP, with no construction or substantive physical changes proposed. Implementation of the LMP would comply with all applicable laws and regulations. As a result, adoption of the proposed LMP and implementation of the goals and tasks contained therein is not anticipated to have any direct or indirect environmental effects which would cause substantial adverse effects on human beings.

REFERENCES

- Brown, D. L. and Wood, D. M. 2002. *Measure Key Connections between the River and Floodplain*. Report to The Nature Conservancy. Available at <http://www.sacramentoriverportal.org>.
- Cannon, T. R. 2004. Farmland Conversion: Should Habitat 'Mitigate' to Agribusiness. Association of Environmental Professionals. *Environmental Monitor*.
- LSA Associates, Inc. 2007. *Draft Solano Multispecies Habitat Conservation Plan*. Version 2.2. Prepared for Solano County Water Agency, February, 2007. Available on: <http://www.scwa2.com/hcp2.2.html>
- Napa County. 2002. Napa County Land Use Plan 1998-2000. *Napa County General Plan*. March 26.
- San Francisco Bay Conservation and Development Commission (SFBCDC). 2007. *San Francisco Bay Plan*. Available on: <http://www.bcdc.ca.gov/index.php?p=633>
- San Francisco Bay RWQCB (San Francisco Bay Regional Water Quality Control Board). 2000. *Watershed management of mercury in the San Francisco Bay Estuary: total maximum daily load report to U.S. EPA*. Oakland, CA.
- San Francisco Estuary Institute (SFEI). 2000. *The pulse of the estuary; tracking contamination with the regional monitoring program 1993–1998*. Oakland, CA.
- San Francisco Estuary Institute (SFEI). 2002. Memorandum: Estimation of Total Mercury Fluxes Entering San Francisco Bay from the Sacramento and San Joaquin River Watersheds. Oakland, CA. Accessed online at http://www.sfei.org/watersheds/reports/Delta_Hg_loads/HgtechnicalMemov6.pdf
- Solano County. 1999. *Solano Solano County Land Use and Circulation Element: a part of the Solano County General Plan*. Fairfield, CA: Solano County Department of Planning.
- Sonoma County. 2007. Official Zoning Database (OZD), Sonoma County Permit and Resource Management Department (PRMD). This digital database is available on: http://www.sonoma-county.org/prmd/docs/zoning_data/
- Tilman, D., D. Wedin and J. Knops. 1996. Productivity and sustainability influenced by biodiversity in grassland ecosystems. *Nature* 379:718-720.
- Tilman, D., K. Cassman, P. Matson, R. Naylor and S. Polasky. 2002. Agricultural sustainability and intensive production practices. *Nature* 418:671-677
- USFWS. 2005. Santa Rosa Plain Conservation Strategy. Available on: http://www.fws.gov/sacramento/es/santa_rosa_conservation.html
- U.S. Geological Survey. 1999. Understanding Earthquake Hazards in the San Francisco Bay Region. USGS Fact Sheet 152-99.

U.S. Geological Survey. 2005. Mineral Resources Data System: U.S. Geological Survey, Reston, Virginia. Online Links: [<http://tin.er.usgs.gov/mrds/>](http://tin.er.usgs.gov/mrds/)

Intergovernmental Panel on Climate Change. Nd. Fact Sheet 4.18: Restoration of Former Wetlands. *IPCC Special Report on Land Use, Land-use Change and Forestry*.
URL: http://www.grida.no/climate/ipcc/land_use/241.htm.